

Exhibit O

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

IN RE TERRORIST ATTACKS ON SEPTEMBER 11, 2001

No. 03 MDL 1570 (RCC)
ECF Case

This document relates to:

ASHTON, *et al.* v. AL QAEDA ISLAMIC ARMY, *et al.*, Case No. 02-CV-6977;

BURNETT, *et al.* v. AL BARAKA INVESTMENT & DEVELOPMENT CORP., *et al.*, Case No. 03-CV-5738;

CONTINENTAL CASUALTY CO., *et al.* v. AL QAEDA ISLAMIC ARMY, *et al.*, Case No. 04-CV-05970;

EURO BROKERS, INC., *et al.* v. AL BARAKA INVESTMENT AND DEVELOPMENT CORP., *et al.*, Case No. 04-CV-07279;

NEW YORK MARINE AND GENERAL INSURANCE CO. v. AL QAIDA, *et al.*, Case No. 04-CV-6105;

TREMSKY, *et al.* v. OSAMA BIN LADEN, *et al.*, Case No. 02-CV-7300; and

WORLD TRADE CENTER PROPERTIES LLC, *et al.* v. AL BARAKA INVESTMENT AND DEVELOPMENT CORP., *et al.*, Case No. 04-CV-07280.

**DECLARATION OF ALAN R. KABAT
IN SUPPORT OF DEFENDANT DR. ABDULLAH NASEEF'S
CONSOLIDATED MOTION TO DISMISS**

I am an attorney licensed to practice in the District of Columbia and am admitted *pro hac vice* in this matter. I am with the law firm of Bernabei & Katz PLLC, counsel to Dr. Abdullah Naseef. I submit this declaration to transmit to the Court the following documents submitted in support of Dr. Naseef's Consolidated Motion to Dismiss:

1. Exhibit 1 to Dr. Naseef's motion to dismiss is a copy of the Declaration of Abdullah Naseef (March 30, 2004).
2. Exhibit 1 to Dr. Naseef's motion to dismiss is a copy of the Virginia Corporate Records and Registrations for the Makkah Mukarramah Charity Trust, Inc.
3. Exhibit 3 to Dr. Naseef's motion to dismiss is a copy of Process Server Network.

"International," online at <http://www.processnet1.com/internat.htm> (last modified Feb. 10, 2004).

4. Exhibit 4 to Dr. Naseef's motion to dismiss is a copy of Process Server Network, "Saudi Arabia," online at http://www.processnet1.com/saudi_arabia.htm (last modified Mar. 8, 2004).

I declare under the penalties of perjury that the foregoing is true and correct to the best of my knowledge and belief. Executed on September 5, 2005.



ALAN R. KABAT

Exhibit 1

Dr. Abdullah Naseef's
Consolidated Motion to Dismiss

03 MDL No. 1570 (RCC)

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

IN RE TERRORIST ATTACKS ON SEPTEMBER 11, 2001

03 MDL No. 1570 (RCC)

THOMAS E. BURNETT, SR., *et al.*,

Plaintiffs,

v.

C.A. No. 03 CV 9849 (RCC)

AL BARAKA INVESTMENT AND DEVELOPMENT
CORPORATION, *et al.*,

Defendants.

DECLARATION OF ABDULLAH NASEEF

I, Dr. Abdullah Naseef, being duly sworn, declare and state as follows:

1. I am over 18 years of age and competent to testify to the matters set forth below of my own personal knowledge.

2. I have been informed by my attorney that I am a defendant (D97) in the above-captioned action. I am submitting this declaration in support of my Motion to Dismiss for lack of personal jurisdiction and improper service of process.

3. I was born in 1939, in Jeddah, Saudi Arabia, and have lived in Saudi Arabia all of my life. I have always been a citizen of the Kingdom of Saudi Arabia.

4. I am a Professor of Geology, at King Abdulaziz University, Jeddah.

5. I was the Secretary-General of the Muslim World League from 1983 until 1993. The Muslim World League is a charity that is sponsored and supported by the Saudi government. In my capacity as Secretary-General, I also served as an officer of the Rabita Trust from 1988 to

1993. The Rabita Trust is a charity that is partly owned by the Muslim World League, and partly owned by the government of Pakistan.

6. In 1993, I was appointed by Royal Decree to the Saudi Majlis-ash-Shura, which is the legislative body of the Saudi government, equivalent to a Parliament in other countries. I became the Deputy Speaker (or Vice President) of the Majlis-ash-Shura, and retired in 2001.

7. I have visited the United States on several occasions since 1965 to study at Stanford University, with my last visit being in 2002 to attend the World Economic Forum Conference. Although I do not now remember the dates, nature, or purposes of all of my visits, these included official visits to attend academic conferences, as well as conferences relating to the Scouting movement. I also made several visits as a tourist.

8. I own no real property in the United States. I also have no bank accounts, and have no investments in the United States. I do not conduct any personal business with any businesses in the United States.

9. I do not subscribe to or read either the *International Herald Tribune* or the *Al Quds al Arabi*. The latter publication, to my knowledge, is banned in the Kingdom of Saudi Arabia.

10. I have never supported the loss of innocent life and believe that there is no justification for the tragic attacks of September 11, 2001. I have never supported any person or organization that I have known to participate in terrorist activities. On September 13, 2001, two other Saudis and I sent a letter to President Bush, which expressed "our condemnation and denunciation of the horrible acts of terrorism perpetrated against the American people and security." We emphasized that these acts were totally contrary to "Islamic values and teachings." See A. Naseef, *et al.*, Letter to President Bush (Sept. 13, 2001) (attached hereto as

Exhibit 1). After receiving a response to our letter, *id.*, I reiterated our willingness to “to work together towards peace in the Middle East and in the world.” *See* A. Naseef, Letter to President Bush (Dec. 31, 2001) (attached hereto as Exhibit 2).

11. The Third Amended Complaint in this case has no allegations about me, other than in three paragraphs. In Paragraph 273 of the Third Amended Complaint, it is stated that the Rabita Trust “is connected to the SAAR Network through two officers,” including myself. Although I served as an officer of the Rabita Trust from 1988 to 1993 in my capacity as Secretary-General of the Muslim World League, I was not involved in the day-to-day operations or activities of the SAAR Network or its components. I deny that I had any knowledge of any activities of the SAAR Network that were terrorist activities, or knowingly supported terrorism.

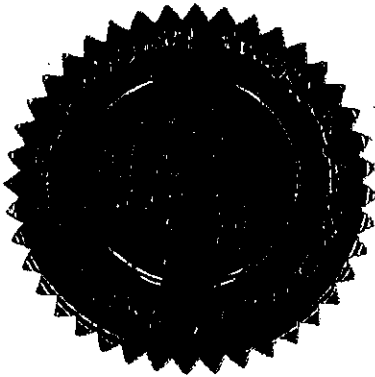
12. Similarly, in Paragraph 274 of the Third Amended Complaint, it is stated that I “founded the Rabita Trust in July 1988 and [am] currently its chairman.” This is incorrect, since I have not been an officer of the Rabita Trust since 1993, and I believe that Wael Jalaidan is the current Secretary General. I have not made any personal donations to the Rabita Trust. I deny that I had any knowledge of any activities of the Rabita Trust that were terrorist activities, or knowingly supported terrorism. I have no knowledge of the day-to-day operations or activities of the Rabita Trust since 1993.

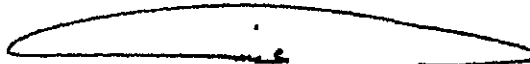
13. In Paragraph 275 of the Third Amended Complaint, it is stated that as part of my “global efforts” to “spread Muslim World League offices around the world,” I was “involve[d] in a SAAR Network charity,” as an “officer of Makkah-al-Mukarramah, Inc., registered in Virginia as a non-profit charity.” I had no involvement with the day-to-day activities or operations of the SAAR Network or the Makkah-al-Mukarramah, Inc., and I deny that I had any knowledge of any activities of either entity that were terrorist activities, or knowingly supported

terrorism.

14. I can read and understand English.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.





Dr. Abdullah Naseef

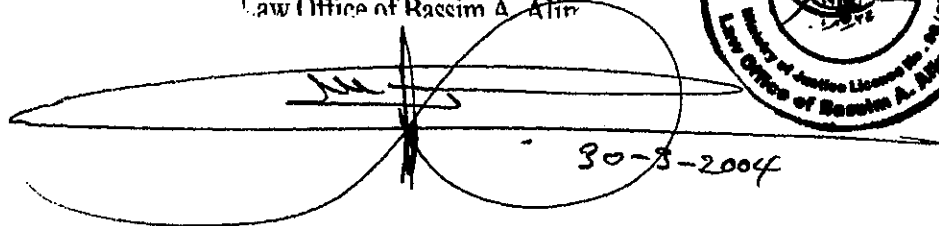
Executed on the 30 day of March, 2004.

This is to certify that
This is the true Signature of the Above Signer
Without Responsibility of the Contents

Bassim A. Alim, Esq.

Law Office of Bassim A. Alim




30-3-2004

Attachment 1 to Naseef Declaration

Dr. Abdullah Naseef's
Motion to Dismiss the Third Amended Complaint

03 MDL No. 1570 (RCC) / C.A. No. 03-CV-9849 (RCC)

**His Excellency President George Bush
President of the United States of America
September 13, 2001**

We would like to express to your Excellency our condemnation and denunciation of the horrible acts of terrorism perpetrated against the American people and security. We would like also to express to you and your family personally and to the victims families and friends and all the friendly people of the United States our deep sorrow and sincere condolences and sympathy.

We would like also to stress upon the fact that Islamic values and teachings totally reject all kinds of violence and acts of terrorism. Islam lays emphasis on the inviolability as well as the sanctity of both human life and dignity regardless of national affiliation, religion, color and/or ethnic background. The value of human lives is highly valued in Islam thus it deems killing one soul with out a just cause is like killing the entire people and saving one soul is a saving the lives of humanity at large. Muslims consider any aggression against innocent people an aggression against God's prohibition and eternal values. In fact, Muslims view such an aggression as deplorable and disgusting.

In addition, we would like to convey our appreciation for your Excellency's noble gesture when you expressed your eagerness about the safety of Arab and Muslims citizens and rejected the cheap media intrigues spread against by parties that are notorious for their hostility against Arabs and Muslim. These parties are known to have made prescriptions leveling accusations against Arabs and Muslims whenever the American people are exposed to a painful accident or detestable aggression. Obviously, the goal of this parties-historically notorious for their trickery is to mislead, confuse, and divert the right course followed the American security agents in pursuing and identifying criminals. The aim of these parties is to obtain the sympathy of the good American people and incite their wrath against Arabs and Muslims so as to justify the on-going massacre they are penetrating against the Palestinian people and destruction of their homes and properties. Sweeping away their palm land, which is an act of genocide unprecedented in the history of mankind.

Finally, we would like to reaffirm to your Excellency our firm conviction that the acts of violence are not the right path to achieve peace and security for people and societies. The right path to achieve all is to have dialogue, justice and to confirm mutual respect between different cultures and civilization.

**Dr. Abdullah Bin Omar Nassif
President of the World Muslim Congress**

**Dr. Hamid Bin Ahmad Al-Rifale
President of International Islamic Forum for Dialogue**

**Dr. Abdullah Bin Biah
Former Minister of Justice
Professor of the University of King AbdulAziz**

Attachment 2 to Naseef Declaration

**Dr. Abdullah Naseef's
Motion to Dismiss the Third Amended Complaint**

03 MDL No. 1570 (RCC) / C.A. No. 03-CV-9849 (RCC)

FROM : Panasonic FAX SYSTEM

PHONE NO. : 96626735438

Feb. 22 2004 04:28AM P1



CONSULATE GENERAL OF THE
UNITED STATES OF AMERICA

Jeddah
December 6, 2001

Dr. Abdullah Bin Omar Naseef
President of the Muslim World Congress

Dear Dr. Naseef:

I have the pleasure of delivering the enclosed letter to you on behalf of
Janet Larocco, Acting Assistant Secretary of State for Near Eastern Affairs, U.S.
Department of State, in response to your letter of September 15 to President Bush.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Richard L. Baltimore III".

Richard L. Baltimore III
Consul General

Dr. Naseef, Dr. AL-RIFAIE, and Dr. Bin Biah, received a letter From U.S.A President Bush Responding on their Latter, Dated 15 September, which was sent to him, regarding terrorist attacks of 11 September.

Please find in the following the complete text of the litter:



Thank you very much for your letter of September 15 offering your kind expression of condolence and friendship and I appreciate your support during this challenging time for the American people.

The United States has welcomed the support of Muslim leaders around the world who have denounced the terrorist attacks of September 11 and rejected any justification for them under Islam. We in the United States know that our fellow Muslim citizens, and our Muslim friends abroad, practice a religion that affirms life and denounces violence. The United States remains committed to working with our Muslim friends to build a more secure, peaceful, and tolerant world for all people.

We hope that the Muslim World Congress will join us in reaching out to other cultures and religions in our efforts to work together toward peace in the Middle East and in the world. Only through mutual understanding and respect will we achieve the peace and security that we are all seeking.

Thank you again for your letter..

World Muslim Congress

President's Office

**مؤتمر العالم الاسلامي**

مكتب الرئيس

Date : _____ التاريخ

Ref : _____ الرقم

31/12/2001

H. E. President George W. Bush
President,
United States of America

I have received on 4 December through the Consul General of America in Jeddah your esteemed letter signed by Mr. James A. Larocco, acting Assistant Secretary of State for Near Eastern Affairs, in response to our letter dated 15 September 2001.

I personally, and on behalf of my colleagues Prof. Kamil E. Al-Sharaef, Secretary General of International Islamic Council for Daw'a and Relief, Prof. Dr. Hamid. A. Al-Rifai, President of International Islamic Forum for Dialogue, and Prof. Dr. Abdullah Bin Niah, Professor of Islamic Law at K.A.A. University welcome your invitation to Muslim World Congress to join your efforts to work together towards peace in the Middle East and in the world.

We are ready to meet any representative assigned by your Excellency in order to discuss together the ideas and views which may help both of us to reach a reasonable and practical plan to achieve this noble goal.

Thank you with best wishes

Prof. Dr. Abdullah Omar Nasseef
President
World Muslim Congress

ص.ب. ٢٠١٢٦ جدة ٢١٤٥٥ - المملكة العربية السعودية - هاتف : ٦٦١٣٦٨٢ - فاكس : ٦٦١٣٣٦٢
P.O.Box 20126 Jeddah 21455, Saudi Arabia - Tel. : 6613682 - Fax : 6613362
E-Mail: mntomar@iname.com / dronasseef@hotmail.com

01/02/2002 WED 16:09 FAX 966 2 669 2991

U.S. CONSULATE JEDDAH

01001

P.O. Box 149
Jeddah 21411
Tel: (966) (02) 667-0080 x4120
FAX: (966) (02) 669-2991

American Consulate Jeddah

To: *Dr. Abdullah Omar Nasseef*
President
World Muslim Congress

From: Mark A. Caudill
Consul (Political)

FAX: 669-3362

Pages: ①

Phone: 661-3682

Date: 01/02/02

Dear Dr. Nasseef:

Thank you for your letter to President Bush which we received today. We have forwarded it to the Department of State in Washington, DC, for passage to the White House.

Sincerely,



سعادة الدكتور عبد الرحمن النعفي

عربي

HOME

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The Founding Board

Board of Supervisors

Sahm Al-Nour Project

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Distributing operations

Organizational Structure >> The Founding Board >> Dr. Abdullah Umar Nasif (Chairman of the Founding Board)



Dr. Abdullah Umar Nasif (Chairman of the Founding Board)

Name: 'Abdullah Bin'Umar Bin Muhammad Naseef

Position: Former Secretary General of Muslim World League, former deputy president of National Dialogue, and former deputy president of Shurah Council of the World Muslim Congress

Nationality: Saudi

Date of Birth: Jeddah, 01/07/1358 A.H.

Address: Kingdom of Saudi Arabia – Jeddah 21523, P.O. Box: 50125

Education

He received his earlier education in Jeddah, where he obtained his high school degree in 1379 A.H. Then, he earned a Bachelors degree in science (chemistry – geology) with a grade of excellence along with the highest degree of honor from the Faculty of Science, Riyadh University, in 1384 A.H.

Later, he obtained a PhD in geology from the University of Leeds, Britain, in 1391 A.H. Afterward, he worked as assistant professor at the Department of Geology in the Faculty of Science, Riyadh University, from 1391 to 1393 A.H. Then, he worked as assistant professor at the University of King Abdul Aziz from 1393 to 1396 A.H. After that, he worked as associate professor at the University of King Abdul Aziz from 1397 to 1403 A.H. Now, he is working as a professor at the same University, having started from 1403 A.H., beside his post as Chairman of the World Muslim Congress.

Work History

He was appointed as the president of the department of Geology in the Faculty of Science, King Abdul Aziz University, Jeddah, from 1393 to 1394 A.H. Then, he was appointed as the secretary general at the same university from 1394 to 1396 A.H. Thereafter, he became the deputy chairman of this university from 1396 to 1400 A.H. Then, a royal decree was issued appointing him as the Chairman of the University of King Abdul Aziz in Jeddah, from 1400 to 1402 A.H. Later, he was appointed as the secretary general of the Muslim World League, Mecca, from 1403 to 1413 A.H., then as deputy chairman of the Saudi Shura Council from 1413 to 1422 A.H., and then as the chairman of the World Muslim Congress, a post that he still occupies at the present time.

Honorary Certificates

- * Honorary PhD in the service of Islam from Omdurman University, Sudan.
- * Honorary PhD in science from the University of Science and Technology, Bening, Malaysia.
- * Honorary PhD in humanities from the University of Mindanao, the Philippines, 1985.
- * Honorary PhD in social sciences from Manila University, the Philippians, 1986.
- * Honorary PhD in law from Khartoum University, Sudan.

Prizes

- * King Faisal International Prize for Service to Islam, in 1991.
- * King Abdul Aziz Medal of the first class (the highest medal in Saudi Arabia)
- * Prince Muhammad Bin Fahd Prize for charitable works, in 2004.
- * The Crescent Medal from the Government of Pakistan.

Conferences and Symposiums

He participated in several committees, symposiums as well as local, regional and international conferences, covering a number of fields: Islam, relief, inter-civilizational dialogue, literature, education, scouting, and geology.

Memberships and Activities

- * Deputy Chairman of the World Assembly of Muslim Youths, Riyadh, Saudi Arabia
- * Chairman of the International Union of Muslim Scouts, Jeddah.
- * Vice Director of the Saudi Scientific Club.
- * Director of Rabiyyat Rowad Al-Harakah Al-Kashfiyyah (League of Scout Movement Pioneers), Riyadh, Saudi Arabia.



POLLS

Are you going to join us?

- ☐ Yes for sure.
- ☐ Yes but I can't afford it now
- ☐ Yes, but I can't reach a representative
- ☐ No, I am not coninvded yet.



FOUND

We have 4 guests

Naseef 015

VISITORS

 you are visitor no. : 780695

NEWSLETTER

Subscribe

Bouquets of Light

- * Vice Chairman of the Board of Directors of the Glorious Qur'an Memorization Association in Mecca.
 - * Member of the Founding Board of the Muslim World League, Mecca.
 - * Member of the International Association for New Muslims, affiliated to the Muslim World League, Mecca.
 - * Member of the Organization of the Scientific Miracles in the Qur'an and Sunnah, Mecca.
 - * Member of the Board of Directors of Darat Al-Malik Abdul Aziz (King Abdul Aziz Foundation for Archives and Research), Riyadh.
 - * Vice Director of Mecca Charitable Foundation, Riyadh.
 - * Member of the International Islamic Association for Education, affiliated to the Muslim World League.
 - * Member of the Charitable Association for Orphans Care, Mecca.
 - * Member of the Board of Directors of Okaz Establishment for Journalism and Publishing, Jeddah.
- And, Outside the Kingdom
- * Member of the Staff of Directors of the International Islamic Council for Da'wah and Relief, Cairo.
 - * Vice Chairman of the Board of Directors of the International Islamic Charitable Organization, Kuwait.
 - * Member of the Board of Trustees of the Islamic Organization for Medical Sciences, Kuwait.
 - * Chairman of the Board of Trustees of the East-West University, Chicago.
 - * Chairman of the Board of Trustees of the Center for Islamic Studies, Oxford University, Britain.
 - * Chairman of the Board of Trustees of the International Islamic University, Chittagong.
 - * Chairman of the Board of Trustees of Dar al-Ishan University, Bangladesh.
 - * Chairman of the Board of Trustees of the Foundation for Islamic Heritage and Environment, London.
 - * President of the Diplomatic Academy for Social Studies, Britain.
 - * Member of the Board of Trustees of the Institute for the History of Arabic-Islamic Science, Frankfurt.
 - * Member of the Board of Trustees of the Foundation of Dar As-Salam, Washington.
 - * Member of the Board of Trustees of the International Islamic University, Islamabad.
 - * Member of the Board of Trustees of the Islamic Academy, Cambridge.
 - * Member of the Council of Directors of the International Council on Alcohol and Addiction, Washington.
 - * Member of the Moroccan Kingdom Academy.
 - * Member of the World Scout Bureau, Geneva.
 - * Fellow of the Geological Society, London.
 - * Fellow of the Geological Society of America, Boulder, USA.
 - * Chairman of the Board of Trustees of Umar ibn Al-Khattab Mosque in Los Angeles, USA.
 - * Chairman of the Board of Trustees of the Australian Islamic Cultural Center, Sydney.
 - * Member of the International Conference on Religion and Islam, New York.
 - * Member of the Board of Trustees of the Islamic University of Niger.
- Scouting Activities:
- * Chairman of the Global Union of Muslim Scouts
 - * Joined scouting in 1376 A.H. and still takes part in this activity.
 - * Participation in developing scouting activities in the Kingdom of Saudi Arabia.
 - * Member of the World Scout Committee in Geneva, Switzerland.

- * Member of the Board of Directors of the Saudi Arabian Boy Scouts Association.
- * External Relations Commissioner for the Saudi Arabian Boy Scouts Association since 1399 A.H. up to the present time.
- * Member of the International Scouting Fund, Switzerland.
- * Head of the Arab Scouting Fund, Cairo.
- * Honorary Chief of the Arab Scouting Pioneers League.
- * Consultant to the Arab Scouting Committee.
- * Former member of the Group for Teaching Methods at the World Scout Bureau, Geneva (for four years).
- * Former member of the International Program Committee at the World Scout Bureau, Geneva (for four years).
- * Awarded the Wooden Medal in 1395 A.H.
- * Awarded the Arab Scout Medal in 1401 A.H.
- * Awarded the Bronze Wolf Medal from the World Scout Committee.
- * Awarded the Silver Hawk Medal from the Greek Scouting Association.
- * Awarded the Medal of the Scouting Association in Bangladesh.

Research and Writings:

- * "Studies of the Rocks of the Al-Qaft Al-Sagheer Road in the Eastern Desert in Egypt". Publisher: Institute of Applied Geology in Jeddah, 1980 A.D.
- * "Igneous and Metamorphic Rocks in Taif in Western Saudi Arabia". Publisher: Journal of the American Geological Association, issue no. 3, part 88, 1980 A.D.
- * "The Arab Granite Shield". Publisher: Institute of Applied Geology in Jeddah, 1980 A.D.
- * "Chemical Geology and Historical Geology of Granite in the Kingdom of Saudi Arabia". Publisher: Institute of Applied Geology in Jeddah, 1980 A.D.

